

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

KHRISTINE M. FLORAY, )  
Plaintiff, )  
v, ) C.A. No.: 05-523-GMS  
DELAWARE PARK, LLC a Delaware )  
Limited Liability Company, ) Trial By Jury Demanded  
Defendant, )

## **JOINT STATUS REPORT**

The parties in the above-captioned matter jointly file the following Status Report:

1. **Jurisdiction and Service.** Jurisdiction is based upon the provisions of 42 U.S.C. §2000(e). Jurisdiction and service are not disputed.
2. **Substance of the Action.** This is an action for discrimination and/or retaliation arising out of the plaintiff's employment and termination from employment.
3. **Identification of Issues.** Whether defendant's actions up to and including plaintiff's discharge from employment were the result of discrimination and/or retaliation against plaintiff because she filed complaints of discrimination, or whether defendant's actions were based upon reasonable business purposes.
4. **Narrowing of Issues.** It is anticipated that the defendant will file a motion for summary judgment.
5. **Relief:** The plaintiff seeks monetary relief for lost wages, pain and suffering, and reinstatement.
6. **Amendment of Pleadings.** Plaintiff will amend the complaint to specifically ask for reinstatement.
7. **Joinder of Parties.** None are expected.

8. **Discovery.** It is expected that the parties will conduct minimal and customary written discovery followed by depositions of each party and relevant witnesses. Discovery is not expected to be overly expansive.

9. **Estimate Trial Length.** 3 days.

10. Jury Trial has been requested.

11. **Settlement:** The parties have had preliminary settlement discussion, and the defendant has stated it is willing to entertain a reasonable demand.

12. Such other matters as counsel considers conducive to the just, speedy and inexpensive determination of this action. None.

13. Plaintiff and defendant have conferred by telephone and have jointly drafted the within Status Report.

POTTER ANDERSON & CORROON LLP ABER, GOLDLUST, BAKER & OVER

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/s/ Wendy K. Voss

WENDY K. VOSS (DSB #3142)  
1313 N. Market Street  
P.O. Box 951  
Wilmington, DE 19899-0951  
(302) 984-6076

*Attorney for Defendant*

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/s/ Gary W. Aber

GARY W. ABER (DSB #754)  
702 King Street, Suite 600  
P.O. Box 1675  
Wilmington, DE 19899  
302-472-4900

*Attorney for Plaintiff*

Dated: November 4, 2005

**CERTIFICATE OF SERVICE**

I, Wendy K. Voss, hereby certify this 4th day of November, 2005, that the foregoing **JOINT STATUS REPORT** was electronically filed with U.S. District Court District of Delaware via CM/ECF (Official Court Electronic Document Filing System) which will send notification of such filing that the document is available for viewing and downloading via CM/ECF to the following counsel of record:

Gary Aber, Esquire  
ABER, GOLDLUST, BAKER & OVER  
702 King Street, Suite 600  
P.O. Box 1675  
Wilmington, Delaware 19899



Wendy K. Voss (No. 3142)  
Hercules Plaza—Sixth Floor  
1313 North Market Street  
Wilmington, DE 19801  
(302) 984-6076 (Telephone)  
(302) 658-1192 (Facsimile)  
[wvoss@potteranderson.com](mailto:wvoss@potteranderson.com) (Email)